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USDOC FOR 532/OEA/M. NICKSON-D/K.GAINS  
USDOC FOR 3131/USFCS/OIO/ANESA/KREISSL  
USDOC FOR 4530/MAC/ANESA/OSA  
ICE HQ FOR STRATEGIC INVESTIGATIONS  
STATE FOR EB/ESP

E.O. 12958: N/A

TAGS: [BEXP](#) [ETRD](#) [ETTC](#) [IN](#)

SUBJECT: EXTRANCHECK: POST-SHIPMENT VERIFICATION: RELIANCE  
COMMUNICATIONS, MUMBAI, INDIA

REF: USDOC 03276

¶1. Unauthorized disclosure of the information provided below is prohibited by Section 12(c) of the Export Administration Act.

¶2. On July 31, 2008, Export Control Officer (ECO) Paul Cushman and FSN Shailendra Srivastava conducted a Post-Shipment Verification (PSV) at Reliance Communications (RELCOM) in Mumbai.

¶3. BIS requested a PSV at RELCOM, located in Dhirubhai Ambani Knowledge City, Navi Mumbai. RELCOM was listed as the ultimate consignee for two high performance emulators manufactured by Analog Devices of Norwood, Massachusetts. Export License: No License Required. ECCN: 3A001.

¶4. ECO and FSN Srivastava met with Mr. Prasad S. Kulkarni, OSP Procurement, Mr. Sai Kiran Dittakavi, Buyer, and Mr. Girish Manglani, Engineer.

¶5. RELCOM representatives were not familiar with BIS regulations and this was the first visit by BIS officials to their facility. Kulkarni provided copies of the following documents relating to this transaction: Analog Devices Invoice, RELCOM Purchase Order, Analog Devices Packing List, Air Waybill, a receipt for duties paid to the Indian Customs Authority, RELCOM Goods Receiving Report, and the Delivery Challan.

¶6. The meeting was held in a RELCOM conference room. Manglani explained that the high performance emulators were used to run simulations and emulations during a research & development project aimed at upgrading their network to provide improved service. The project was terminated in 2007. Manglani stated that the emulators will be stored until another use for them is found.

¶7. Manglani presented the emulators for inspection. ECO physically verified the serial numbers as 561011 and 561012.

¶8. Established in 2002 as Reliance Infocomm Limited, Reliance Communications is India's largest private sector information and communications company. RELCOM boasts a reliable, high capacity, integrated, digital network. A roving security force is on duty at the facility 24/365.

¶9. Recommendation: At the time of this visit, Reliance Communications appeared to be a reliable recipient of this controlled technology. The items on check were physically verified and were being used in a manner consistent with the Export Administration Regulations.

WHITE